



## Air Managers Committee/State Caucus

### Regional Haze/WRAP Activity Update August, 2005

#### Modeling Guidance and Protocol for BART/Better than BART/Beyond BART analysis

The WRAP staff and the Regional Modeling Center (RMC) are developing protocol to help states and tribes with consistency in their BART analyses. The protocol will describe how the RMC can, using its regional modeling capabilities assist states and tribes that wish it, to identify sources subject to BART, BART determinations and BART benchmarks. This capability provides a modeling option to CALPUFF for states and tribes. The general approach for BART analysis, is that:

- 1) States and tribes that do case-by-case BART will go ahead, using the EPA CALPUFF guidelines, or results of regional modeling by the RMC.
- 2) WRAP will compile the case-by-case BART analyses into regional SO<sub>2</sub> and NO<sub>x</sub> emission "benchmarks" based on modeled SO<sub>2</sub> and NO<sub>x</sub> impacts on haze in each Class I area.
- 3) States may then use the "benchmarks" as a foundation for setting milestones or caps on SO<sub>2</sub> and NO<sub>x</sub>.

A short questionnaire was sent out to air managers to get an idea of what tools should be incorporated in the regional modeling protocol. The protocol should be proposed for comment shortly and ready before the end of the year.

#### EPA BART Guidelines to be Challenged

EPA has received notice from several parties that they intend to sue over various parts of the June 15 final BART Guidelines. The parties include: Utility Air Regulatory Group (UARG), Center for Energy and Economic Development (CEED), National Parks Conservation Association (NPCA) and Commonwealth of Massachusetts. A preliminary partial list of issues include: Presumptive limits for EGU's >750 MW; All BART eligible sources cause or contribute (one of the state options); 1 and 0.5 deciview cause and contribute threshold; Averaging method of determining visibility change in Class I Areas. More about this in the coming months...

#### Fire Forum Starts work on Phase III/IV Fire Emissions Inventories-2002 and 2018 planning EIs.

The final two phases of the fire emissions inventory are underway. Air Sciences has been assigned the work, which will result in final fire emissions inventories for the 2000-2004 baseline and the 2018 projection year. These emission inventories will be for all types of fire, and will be used to model visibility impacts from fire. The workplan, entitled "*Development of 2000-04 Baseline Period and 2018 Projection Year Emission Inventories*" is available on the WRAP website. See ([PDF](#))

### Attribution of Haze/TSS work group begins work on technical support system

The Attribution of Haze Work Group has prepared a project plan for the Phase II Attribution of Haze report. This project will be developed along with a **Technical Support System (TSS)**, which will provide state and tribal planners with a **web-based resource** that displays all the technical information to support regional haze plans, including an interactive web site. Four groups of contractors/subcontractors will be bringing special skills to the project. States and tribes have expressed some concerns about how the TSS tool should be used, and in what form EPA will need the technical support material for review. Historically, the technical support documents (TSD's) have been hard copies of reports and studies. The TSS concept is that information needed for plan support can be downloaded selectively from the web, hard-copied or electronically recorded for review. TSS will also have the capability of being updated, so has potential for use in subsequent SIPs and TIPs.

The project plan can be seen at: ([PDF](#) or [DOC](#)). A conceptual diagram and key can be seen at: ([PDF](#) or [DOC](#)) and ([PDF](#) or [DOC](#)) respectively. The project management structure and timeline can be seen at: ([PDF](#) or [DOC](#)) ([PDF](#) or [DOC](#))

### Implementation Work Group

Work is continuing on **SIP and TIP templates, and EPA development of a protocol for reviewing 308 SIP's**. States and tribes are in various steps in their regional haze planning. Most states are still in the initial stages, except for Colorado, which must have a completed SIP ready for legislative review in early 2007. Tribal regional haze planning strategies are to be active participants in state SIP processes on issues important to tribes, and to work from state plans to develop their own TIPs, or wait for EPA to develop FIPs where needed.

### Dust Forum Completes Fine Fraction Analysis

The project, "Analysis of the Fine Fraction of Particulate Matter in Fugitive Dust" is complete. The draft results are quite interesting - showing that the AP-42 **PM<sub>2.5</sub> dust emissions factor is biased high** due to the measurement methods used several years ago by EPA to derive the original PM<sub>2.5</sub> and PM<sub>10</sub> dust emissions factors. **The fine fraction of PM<sub>10</sub> dust should be 10 to 15 %, instead of the 20 to 25%.** If this analysis holds up (and there are still some questions about artifacts of the sampling technique) there are implications for impacts from all dust sources, especially those near Class I areas, as well as the more general use by states, tribes and local air agencies in EI preparation. ENVIRON will analyze the methods used by state and tribal data providers for area dust sources such as construction and agriculture, and provide recommendations for changes. The RMC has adjusted the windblown dust model and EI to reflect the Fine

Fraction project results. See the Draft Report at: [PDF](#) (1MB) or [ZIP](#) (1.3MB Zipped Doc file)

### **IN and NEAR Forum**

**Final Report: Evaluation of PM10 State Implementation Plans and Their Applicability to Visibility Control in Western Class I Areas**

Final Report (2MB) [PDF](#) Summary Presentation [PDF](#) or [PPT](#)

### **Stationary Sources Joint Forum**

**Site-specific Tribal Emissions Inventories Report** is in draft. This report describes the 2002 emission estimates, methods and results for the tribal point source and oil and gas emission inventory project. See this draft at: ([PDF](#) or [DOC](#))

The SSJF has reviewed the status of work on the draft report on BART-eligible sources. **The final draft of this report should be out around the middle of October. STATE AND TRIBES SHOULD REVIEW THEIR RESPECTIVE SECTIONS AND MAKE ANY CORRECTIONS BY OCTOBER 7.**

See the draft at:

- Executive Summary [PDF](#) or [DOC](#)
- BART Report Without Appendices [PDF](#) (.9 MB) or [DOC](#) (2.6 MB)
- BART Report With Appendices (2.5 MB) [PDF](#)
- Appendix H: Master List of Sources and Their Eligibility [XLS](#) (1.3 MB)
- Appendix K: Eligibility of Steam Electric Plants at the Unit Level [XLS](#) (0.3 MB)